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Attorneys for Defendants
UBER TECHNOLOGIES, INC., RASIER, LLC,
and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

Jaylynn Dean v. Uber Techs., Inc.,
No. 23-cv-06708

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF ADMINISTRATIVE
MOTION TO STRIKE**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn, declare as follows:

2 1. I am an attorney at law duly admitted to practice before the courts of the State of California
3 and a partner with the law firm of Kirkland & Ellis LLP, counsel of record for Defendants Uber
4 Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Uber”) in this action. I have personal
5 knowledge of each and all of the facts stated in this declaration and, if called as a witness, could and would
6 competently testify to the facts contained herein.

7 2. On December 31, after reviewing the Plaintiff’s filed Exhibit and Witness list, I wrote to
8 Plaintiff and as relevant to this motion stated: “We have reviewed your exhibit and witness lists, which
9 remain inconsistent with the length of case. We’ll file an administrative motion to strike, unless you agree
10 to substantially trim the lists down by Friday at 5:00PT. Let me know if you agree to do so.”

11 3. I followed up by email in the morning (Pacific time) on Friday, January 2 regarding the
12 administrative motion to strike, as well as other matters. Although I received a response from Plaintiff to
13 my Friday morning email, that response did not address the portion of my email regarding the motion to
14 strike. Accordingly, I followed up on Friday afternoon at 1:46 PM PT asking: “Please let me know your
15 position on our motion to strike the exhibit list, which we’ll get on file after 5:00pm PT today, consistent
16 with our two prior emails to you on this topic.” At 2:25 PM PT, I received a response to other aspects of
17 my email, but not to the request for a position on the motion to strike.

18 4. Based on previous disagreements on this issue, I do not expect that Plaintiff will file a
19 substantially trimmed list and they have not done so as of the time of filing this motion, which is after
20 5:00PM.

21 I declare under penalty of perjury under the laws of the United States and the State of California
22 that the foregoing is true and correct.

23 Dated: January 2, 2026

24
25 /s/ Laura Vartain Horn
Laura Vartain Horn